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Newcastle Corp., and Ramparts, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SIERRA DEVELOPMENT CO. d/b/a CLUB
CAL NEVA,

Plaintiff,

v.

CHARTWELL ADVISORY GROUP, LTD.

Defendant.

CASE NO. 3:13-cv-00602-RTB-VPC

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION TO FILE
MOTION FOR ATTORNEYS' FEES AND
COSTS AND TO SUBMIT BILL OF
COSTS**

(SIXTH REQUEST)

CHARTWELL ADVISORY GROUP, LTD.,

Counterclaim Plaintiff,

v.

SIERRA DEVELOPMENT CO., *et al.*,

Counterclaim Defendants.

Defendant/Counterclaimant Chartwell Advisory Group, LTD. ("Chartwell"), Counterclaim Defendant Pioneer Hotel, Inc. ("Pioneer"); Counterclaim Defendants Mandalay Resort Group, MGM Resorts International, MSE Investments, Inc., Gold Strike Investments, Inc., Newcastle Corp. and Ramparts, Inc. (collectively, the "Mandalay Parties"); Counterclaim Defendants Harrah's Las Vegas, LLC, Harrah's Laughlin, LLC and Rio Properties, LLC (collectively, the "Harrah's Parties" and together with Pioneer and the Mandalay Parties as

"Counterclaim Defendants"), by and through their respective counsel, hereby stipulate and agree as Follows:

1. On July 6, 2018, this Court entered its Memorandum Decision following the Bench Trial in this case. [ECF No. 689]

2. That same day, the clerk of the Court entered Judgment in accordance with this Court's Memorandum Decision. [ECF No. 690]

3. Based on these dates, any motions for attorneys' fees and costs pursuant to Fed. R. Civ. P. 54(d) and/or requests for taxable costs under Local Rule 54-1 would have been due within fourteen (14) days, or by **July 20, 2018**.

4. On July 19, 2018, the Parties filed a Stipulation and Proposed Order to extend the July 20, 2018 deadline to August 3, 2018 so the Parties could explore the possibility of resolution [ECF No. 691].

5. The Court granted this Stipulation on July 27, 2018. [ECF No. 695]

6. On August 1, 2018, the parties sought an additional two week extension of the August 3, 2018 date as negotiations were ongoing. [ECF No. 692]

7. Again, on August 15, 2018, the parties sought another two week extension to August 31, 2018. [ECF No. 698]

8. On August 30, 2018, the parties sought an additional two week extension to September 14, 2018 (the "August 30 Stipulation"). [ECF No. 703]

9. On September 4, 2018, this Court granted the parties August 30 Stipulation. [ECF No. 704]

10. On September 13, 2018, the parties sought another two week extension to September 28, 2018. [ECF No. 707]

11. The Parties have reached a resolution, but out of an abundance of caution, the parties seek to extend the deadline for an additional two weeks in order to finalize the settlement documents.

12. As such, the parties request an additional two-week extension of time to file any motions for attorneys' fees and costs under Fed. R. Civ. P. 54(d) and/or any requests for taxable

costs under Local Rule 54-1, such that all such motions and requests would be due on or before
October 12, 2018.

13. The Parties request this extension in good faith and not for any dilatory motive.

DATED this 28th day of September, 2018.

PISANELLI BICE PLLC

DILWORTH PAXSON LLP

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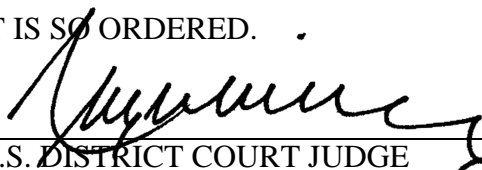
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ORDER

Based upon the Stipulation of the Parties, and good cause appearing therefore, IT IS
HEREBY ORDERED:

The Deadline for the Parties to submit any motions for attorneys' fees and costs pursuant to
Fed. R. Civ. P. 54(d) and/or any requests for costs pursuant to Local Rule 54-1 shall be extended to
October 12, 2018. No more extensions.

IT IS SO ORDERED. .



U.S. DISTRICT COURT JUDGE

DATED: October 3, 2018